



June 16, 2017

Ms. Esther Barajas-Ochoa
Regulations Coordinator
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-12B
1001 I Street
Sacramento, CA 95812

RE: Glyphosate Proposition 65 NSRL Proceeding

Dear Ms. Barajas-Ochoa:

The California League of Food Processors (CLFP) submits the following comments regarding the Office of Environmental Health Hazard Assessment's (OEHHA) proposed Proposition 65 No Significant Risk Level (NSRL) for glyphosate. CLFP is a statewide trade association of food companies who market products to markets across the United States. Some CLFP members process fruits and vegetables where the herbicide glyphosate may have been used in the fields, and so they have a direct interest in the outcome of this proceeding.

On March 15, 2017 the European Chemicals Agency (ECA), a European Union Government agency, issued its findings regarding whether glyphosate poses a human health hazard. In its report, ECA stated that "the available scientific evidence did not meet the criteria to classify glyphosate as a carcinogen, as a mutagen, or as toxic for reproduction." Likewise, the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), an international scientific group administered jointly by the Food and Agriculture Organization of the United Nations and the World Health Organization (IARC's parent organization) concluded in May 2016 that "glyphosate is unlikely to pose a carcinogenic risk to humans from exposure through the diet." These conclusions are consistent with numerous toxicological studies conducted over many years, including reports by the Canadian Pest Management Agency, Japan Food Safety Commission, and European Food Safety Authority. The consensus of these and other regulatory and scientific bodies is that there is no evidence of carcinogenicity for glyphosate.

OEHHA is basing its listing and the establishment of an NSRL entirely on findings of the International Agency for Research on Cancer (IARC). However, the studies used by IARC do not provide a sound foundation for any rulemaking. OEHHA's own review found issues with three of the four studies that were selected to be the basis of the IARC report. CLFP does not understand why OEHHA feels compelled to move forward given the lack of compelling data supporting the IARC findings, and the substantial number of studies that indicate that glyphosate does not pose a human health risk.

The weight of technical evidence available at this time indicates that glyphosate does not cause cancer, and proven science should prevail. If that is the case, then setting an NSRL is problematic as there is no proven significant risk associated with exposure. How can the agency quantify an NSRL when at least nine other international organizations indicate that there is no risk? Establishing a finite NSRL also risks creating conflicts with tolerances set by the U.S. Environmental Protection Agency for glyphosate residues in food. CLFP recommends that OEHHA state that exposure to glyphosate at any level poses no significant risk of cancer to humans.

CLFP appreciates the opportunity to provide comments regarding this issue. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rob Neenan", with a long horizontal flourish extending to the right.

Rob Neenan
President/CEO